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19-mj-483 KMM

CLERK, U.S. DISTRICT COURT OF MINNESOTA
ST. PAUL, MINNESOTA
COUNTY OF RAMSEY

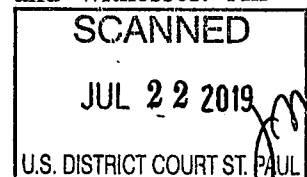
)
) ss. AFFIDAVIT OF LAURA GULICK
)

I, Laura K. Gulick, being duly sworn, state the following:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been so employed since September 2014. Before joining the ATF, I was employed as an Intelligence Research Specialist for Homeland Security Investigations from November 2006 until joining ATF. As an Intelligence Research Specialist, I assisted in hundreds of investigations regarding federal crimes, including firearms violations and narcotic violations. Prior to my employment with HSI, I was an active duty Military Intelligence Officer in the United States Army. In my capacity as an ATF agent, my responsibilities include, but are not limited to, investigating firearms violations under Title 18 of the United States Code. Among other activities, I have participated in undercover operations using confidential sources and undercover law enforcement officers, debriefed witnesses and confidential sources, assisted in writing applications for pen registers and TIII wire intercepts, and utilized phone toll analysis and GPS location information to advance investigations.

2. I make this affidavit in support of a criminal complaint and arrest warrants charging defendants Eric ESPINOZA-REYNOSA, Luis Carlos FAVELA, and Jesus Rodrigo MILLAN with conspiracy to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance, in violation of 21 U.S.C. Sections 841(a)(1) and 841(b)(1)(A), and 846.

3. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents, investigators, and witnesses. All



observations referenced below that were not personally made by me were related to me by the persons who made such observations. This Affidavit contains information necessary to support probable cause for this complaint and arrest warrants. It is not set forth all of my knowledge about this matter.

4. On July 19, 2019, Ramsey County Sheriff's Office investigators and the Drug Enforcement Administration received information from two Confidential Sources that a large shipment of methamphetamine would be arriving in Minnesota this day. The information provided by the Confidential Sources led to the identity of 2808 Silver Lane, garage #43 in St. Anthony, Minnesota, as the location where this methamphetamine shipment would be arriving. Additionally, one of the Confidential Sources identified an older model Range Rover with Nevada plates as the vehicle that would contain the methamphetamine hidden inside.

5. On July 19, 2019, at approximately 12:20 p.m., surveillance officers saw a flatbed trailer off-load an older model Range Rover and place it inside garage #43 at 2808 Silver Lane N.E. in St. Anthony, Minnesota (hereinafter "garage 43"). When the Range Rover arrived, it had no license plates. Officers maintained surveillance at this location throughout the day. Shortly after the Range Rover was dropped off, surveillance officers saw a white Chevrolet pick-up with Minnesota plate 434-WUE arrive and park near garage #43. Surveillance officers noted "Innovative Results Construction" stickers affixed to the truck. Surveillance officers saw an unidentified male exit the passenger seat of the Chevy truck and look around the parking lot near garage #43, then get back into the truck. Surveillance officers saw the Chevy truck drive around the area and noted it appeared to be looking for any law enforcement surveillance.

6. At approximately 4:40 p.m., surveillance officers saw a white Nissan Altima with Minnesota plate AYH-470 (hereinafter "the first Altima") park near garage #43. Surveillance

officers saw a male, later identified as Luis Carlos FAVELA ("FAVELA") exit the passenger seat and walk into garage #43 carrying a duffel bag. Surveillance officers saw the first Altima leave driven by a man who would later be identified as Eric ESPINOZA-REYNOSA ("ESPINOZA"). Surveillance officers saw ESPINOZA drive the first Altima around the apartment complex area and it appeared he was looking for any police surveillance.

7. At this time, surveillance officers saw FAVELA close the door to garage #43 where the Range Rover was located. During this time, another white Nissan Altima with Minnesota plate 918-PYB (the "second Altima") drove to the area of garage #43. Surveillance officers saw the male driver, who would later be identified as Jesus Rodrigo MILLAN ("MILLAN") drive in the area of garage #43 and appear to be looking for law enforcement surveillance. ATF Special Agent Laura Gulick observed MILLAN driving by himself down a dead-end road in the neighborhood and other officers observed MILLAN driving slowly around the residential area. Officers did not observe MILLAN stop or park at a different endpoint. But officers did observe MILLAN intently looking at parked surveillance officers as he drove around the area. Shortly afterwards, MILLAN was seen with another person (later identified as FAVELA) in the front passenger seat. MILLAN is currently under US Probation supervision for a prior federal drug conspiracy conviction in the District of Minnesota (United States v. Jesus Rodrigo Millan, 13-255(3) DSD/FLN).

8. At approximately 5:05 p.m., surveillance officers saw ESPINOZA return and then park the first Altima near garage #43. Approximately 10 minutes later, officers saw FAVELA walk out of garage #43 carrying what appeared to be the same duffel bag he had when officers saw him go into garage #43. FAVELA then placed the duffel bag into the trunk of the first Altima. Surveillance officers saw ESPINOZA drive the first Altima out of the area. Officers saw FAVELA walk towards the apartment complex, then out of the officers' view.

9. Officers requested that law enforcement conduct a traffic stop on the first Altima driven by ESPINOZA. When the squad activated the emergency lights in the area of Silver Lake Road and County Road E in New Brighton, ESPINOZA accelerated rapidly and fled law enforcement. During the ensuing chase, ESPINOZA drove down a dead-end street in a residential area. ESPINOZA drove up onto the grass adjacent to a park with baseball fields, then drove back the way he came. As he did so, he struck the mirror of an undercover vehicle that had joined the pursuit. A second officer involved in the pursuit was forced to swerve out of the way to avoid a collision with ESPINOZA. ESPINOZA then fled west on County E at speeds of up to 80 mph. As ESPINOZA tried to turn south on 16 Ave S.W., he lost control of the vehicle and crashed into a curb, disabling his vehicle. ESPINOZA then fled on foot and hid inside a boat under the boat cover approximately one block from where he crashed.

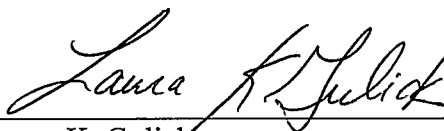
10. Officers located approximately 4 pounds of methamphetamine in the front passenger seat and approximately 52 pounds of methamphetamine in the trunk of the Altima crashed by ESPINOZA. This recovered evidence field-tested positive for methamphetamine. Outside of the vehicle, officers found two cell phones where ESPINOZA had run.

11. Officers also followed the second Altima until it stopped at a Marathon gas station located in New Brighton. At this time, investigators arrested the driver, MILLAN, and the passenger, FAVELA. MILLAN was found to be wearing a t-shirt bearing the business name "Innovative Construction Results" on the front. In a search incident to arrest, FAVELA was found to possess a number of screws consistent with those used in the Land Rover to secure the interior molding to the vehicle. FAVELA also had possession of a screwdriver that appears to be the missing screwdriver from a set of new screwdrivers found inside of garage #43.

CONCLUSION

9. Based on the foregoing, there is probable cause to believe that on or about July 19, 2019, the defendants Eric ESPINOZA-REYNOSA, Luis Carlos FAVELA, and Jesus Rodrigo MILLAN conspired to distribute and possess with the intent to distribute over 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance, in violation of in violation of 21 U.S.C. Sections 841(a)(1) and 841(b)(1)(A), and 846.

Further your Affiant sayeth not.



Laura K. Gulick
Special Agent, ATF

SUBSCRIBED and SWORN to before me
this 22nd day of July, 2019



THE HONORABLE KATE M. MENENDEZ
UNITED STATES MAGISTRATE JUDGE